

1 **REQUEST NO. 25:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
2 chip for a notebook computer manufacturer.

3 **RESPONSE TO REQUEST NO. 25:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
9 identities of “notebook computer manufacturer[s]” and the meaning of what constitutes a
10 “proposal”.

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12 **REQUEST NO. 26:** Documents listing each and every television manufacturer that has
13 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
13 the last six years.

14 **RESPONSE TO REQUEST NO. 26:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
17 unduly burdensome such as calling for the production of documents listing “each and every
18 television manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
19 “television manufacturer[s]” and their “products”; and (d) it calls for information not within the
20 possession or control of FMA.

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1 **REQUEST NO. 27:** Documents listing each and every television that has used or incorporated
2 an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 27:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents "listing each and every
7 television"; (c) it is vague and ambiguous, in particular as to what constitutes a television and
8 what constitutes "used or incorporated"; (d) it seeks information equally available to Plaintiffs;
9 and (e) it calls for information not within the possession or control of FMA.

10 **REQUEST NO. 28:** Documents listing each and every contract entered into within the last six
11 years between FMA and a television manufacturer involving an FMA dynamic memory chip.

12 **RESPONSE TO REQUEST NO. 28:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
15 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
16 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
17 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
18 the meaning of what constitutes a "contract" and the identities of "television manufacturer[s]".

1 **REQUEST NO. 29:** Documents listing each and every request made within the last six years by
2 a television manufacturer for proposals from FMA to develop, manufacture, distribute, or
otherwise produce an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 29:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
9 identities of “television manufacturer[s]” and the meaning of what constitutes a “request... for
10 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

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12 **REQUEST NO. 30:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a television manufacturer.

14 **RESPONSE TO REQUEST NO. 30:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
19 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
20 identities of “television manufacturer[s]” and the meaning of what constitutes a “proposal”.

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1 **REQUEST NO. 31:** Documents listing each and every DVD player manufacturer that has
2 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

3 **RESPONSE TO REQUEST NO. 31:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents listing each and every “DVD
7 player manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “DVD
8 player manufacturer[s]” and their “products”; and (d) it calls for information not within the
9 possession or control of FMA.

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11 **REQUEST NO. 32:** Documents listing each and every DVD player that has used or incorporated an FMA dynamic memory chip within the last six years.

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12 **RESPONSE TO REQUEST NO. 32:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
15 unduly burdensome such as calling for the production of documents “listing each and every DVD
16 player”; (c) it is vague and ambiguous, in particular as to what constitutes a “DVD player” and
17 what constitutes “used or incorporated”; (d) it seeks information equally available to Plaintiffs;
18 and (e) it calls for information not within the possession or control of FMA.

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1 **REQUEST NO. 33:** Documents listing each and every contract entered into within the last six
2 years between FMA and a DVD player manufacturer involving an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 33:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a "contract" and the identities of "DVD player manufacturer[s]".

10 **REQUEST NO. 34:** Documents listing each and every request made within the last six years by
11 a DVD player manufacturer for proposals from FMA to develop, manufacture, distribute, or
12 otherwise produce an FMA dynamic memory chip.

13 **RESPONSE TO REQUEST NO. 34:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
16 and/or confidential information not reasonably calculated to lead to the discovery of admissible
17 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
18 documents "listing each and every request"; (d) it is vague and ambiguous, in particular as to the
19 identities of "DVD player manufacturer[s]" and the meaning of what constitutes a "request... for
20 proposal[]"; and (e) it calls for information not within the possession or control of FMA.

1 **REQUEST NO. 35:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
3 chip for a DVD player manufacturer.

4 **RESPONSE TO REQUEST NO. 35:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
9 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
10 identities of “DVD player manufacturer[s]” and the meaning of what constitutes a “proposal”.

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12 **REQUEST NO. 36:** Documents listing each and every car stereo manufacturer that has
13 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
14 the last six years.

15 **RESPONSE TO REQUEST NO. 36:** In addition to its General Objections, FMA objects to
16 the request on the following grounds: (a) it seeks information that is neither relevant to this action
17 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
18 unduly burdensome such as calling for the production of documents listing “each and every car
19 stereo manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “car stereo
20 manufacturer[s]” and their “products”; and (d) it calls for information not within the possession or
21 control of FMA.

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1 **REQUEST NO. 37:** Documents listing each and every car stereo that has used or incorporated
2 an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 37:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents "listing each and every car
7 stereo"; (c) it is vague and ambiguous, in particular as to what constitutes "used or incorporated";
8 (d) it seeks information equally available to Plaintiffs; and (e) it calls for information not within
9 the possession or control of FMA.

10 **REQUEST NO. 38:** Documents listing each and every contract entered into within the last six
11 years between FMA and a car stereo manufacturer involving an FMA dynamic memory chip.

12 **RESPONSE TO REQUEST NO. 38:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
15 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
16 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
17 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
18 the meaning of what constitutes a "contract" and the identities of "car stereo manufacturer[s]".

1 **REQUEST NO. 39:** Documents listing each and every request made within the last six years by
2 a car stereo manufacturer for proposals from FMA to develop, manufacture, distribute, or
3 otherwise produce an FMA dynamic memory chip.

4 **RESPONSE TO REQUEST NO. 39:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
9 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
10 identities of “car stereo manufacturer[s]” and the meaning of what constitutes a “request... for
11 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

12 **REQUEST NO. 40:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
14 chip for a car stereo manufacturer.

15 **RESPONSE TO REQUEST NO. 40:** In addition to its General Objections, FMA objects to
16 the request on the following grounds: (a) it seeks information that is neither relevant to this action
17 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
18 and/or confidential information not reasonably calculated to lead to the discovery of admissible
19 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
20 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
21 identities of “car stereo manufacturer[s]” and the meaning of what constitutes a “proposal”.

1 **REQUEST NO. 41:** Documents listing each and every automobile manufacturer that has
2 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
 the last six years.

3 **RESPONSE TO REQUEST NO. 41:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents listing each and every
7 “automobile manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
8 “automobile manufacturer[s]” and their “products”; and (d) it calls for information not within the
9 possession or control of FMA.

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11 **REQUEST NO. 42:** Documents listing each and every automobile that has used or incorporated
12 an FMA dynamic memory chip within the last six years.

13 **RESPONSE TO REQUEST NO. 42:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
16 unduly burdensome such as calling for the production of documents “listing each and every
17 automobile”; (c) it is vague and ambiguous, in particular as to what constitutes “used or
18 incorporated”; (d) it seeks information equally available to Plaintiffs; and (e) it calls for
19 information not within the possession or control of FMA.

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1 **REQUEST NO. 43:** Documents listing each and every contract entered into within the last six
2 years between FMA and an automobile manufacturer involving an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 43:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “automobile manufacturer[s]”.

10 **REQUEST NO. 44:** Documents listing each and every request made within the last six years by
11 an automobile manufacturer for proposals from FMA to develop, manufacture, distribute, or
12 otherwise produce an FMA dynamic memory chip.

13 **RESPONSE TO REQUEST NO. 44:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
16 and/or confidential information not reasonably calculated to lead to the discovery of admissible
17 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
18 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
19 identities of “automobile manufacturer[s]” and the meaning of what constitutes a “request... for
20 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

1 **REQUEST NO. 45:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for an automobile manufacturer.

3 **RESPONSE TO REQUEST NO. 45:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
9 identities of “automobile manufacturer[s]” and the meaning of what constitutes a “proposal”.

11 **REQUEST NO. 46:** Documents listing each and every LCD display manufacturer that has
12 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

13 **RESPONSE TO REQUEST NO. 46:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
16 unduly burdensome such as calling for the production of documents listing “each and every LCD
17 display manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “LCD
18 display manufacturer[s]” and their “products”; and (d) it calls for information not within the
19 possession or control of FMA.

1 **REQUEST NO. 47:** Documents listing each and every LCD display that has used or
2 incorporated an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 47:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents “listing each and every LCD
7 display”; (c) it is vague and ambiguous, in particular as to what constitutes a LCD display and
8 what constitutes “used or incorporated”; (d) it seeks information equally available to Plaintiffs;
9 and (e) it calls for information not within the possession or control of FMA.

10 **REQUEST NO. 48:** Documents listing each and every contract entered into within the last six
11 years between FMA and an LCD display manufacturer involving an FMA dynamic memory chip.

12 **RESPONSE TO REQUEST NO. 48:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
15 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
16 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
17 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
18 the meaning of what constitutes a “contract” and the identities of “LCD display manufacturer[s]”.

1 **REQUEST NO. 49:** Documents listing each and every request made within the last six years by
2 an LCD display manufacturer for proposals from FMA to develop, manufacture, distribute, or
otherwise produce an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 49:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
9 identities of “LCD display manufacturer[s]” and the meaning of what constitutes a “request... for
10 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

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12 **REQUEST NO. 50:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for an LCD display manufacturer.

14 **RESPONSE TO REQUEST NO. 50:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
19 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
20 identities of “LCD display manufacturer[s]” and the meaning of what constitutes a “proposal”.

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1 **REQUEST NO. 51:** Documents listing each and every climate control unit manufacturer that
2 has purchased an FMA dynamic memory chip for use or incorporation in one of its products
3 within the last six years.

4 **RESPONSE TO REQUEST NO. 51:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
7 unduly burdensome such as calling for the production of documents listing each and every
8 “climate control unit manufacturer”; (c) it is vague and ambiguous, in particular as to the
9 identities of “climate control unit manufacturer[s]” and their “products”; and (d) it calls for
information not within the possession or control of FMA.

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11 **REQUEST NO. 52:** Documents listing each and every climate control unit that has used or
incorporated an FMA dynamic memory chip within the last six years.

12 **RESPONSE TO REQUEST NO. 52:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
15 unduly burdensome such as calling for the production of documents “listing each and every
16 climate control unit”; (c) it is vague and ambiguous, in particular as to what constitutes a “climate
17 control unit” and what constitutes “used or incorporated”; (d) it seeks information equally
18 available to Plaintiffs; and (e) it calls for information not within the possession or control of
19 FMA.

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1 **REQUEST NO. 53:** Documents listing each and every contract entered into within the last six
2 years between FMA and a climate control unit manufacturer involving an FMA dynamic memory
chip.

3 **RESPONSE TO REQUEST NO. 53:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “climate control unit
0 manufacturer[s]”.

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12 **REQUEST NO. 54:** Documents listing each and every request made within the last six years by
13 a climate control unit manufacturer for proposals from FMA to develop, manufacture, distribute,
or otherwise produce an FMA dynamic memory chip.

14 **RESPONSE TO REQUEST NO. 54:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
19 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
20 identities of “climate control unit manufacturer[s]” and the meaning of what constitutes a
21 “request... for proposal[]”; and (e) it calls for information not within the possession or control of
22 FMA.

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1 **REQUEST NO. 55:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a climate control unit manufacturer.

3 **RESPONSE TO REQUEST NO. 55:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
9 identities of “climate control unit manufacturer[s]” and the meaning of what constitutes a
10 “proposal”.

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12 **REQUEST NO. 56:** Documents listing each and every printer manufacturer that has purchased
13 an FMA dynamic memory chip for use or incorporation in one of its products within the last six
years.

14 **RESPONSE TO REQUEST NO. 56:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
17 unduly burdensome such as calling for the production of documents listing “each and every
18 printer manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “printer
19 manufacturer[s]” and their “products”; and (d) it calls for information not within the possession or
20 control of FMA.

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REQUEST NO. 57: Documents listing each and every printer that has used or incorporated an FMA dynamic memory chip within the last six years.

RESPONSE TO REQUEST NO. 57: In addition to its General Objections, FMA objects to the request on the following grounds: (a) it seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and unduly burdensome such as calling for the production of documents “listing each and every printer”; (c) it is vague and ambiguous, in particular as to what constitutes a printer and what constitutes “used or incorporated”; (d) it seeks information equally available to Plaintiffs; and (e) it calls for information not within the possession or control of FMA.

REQUEST NO. 58: Documents listing each and every contract entered into within the last six years between FMA and a printer manufacturer involving an FMA dynamic memory chip.

RESPONSE TO REQUEST NO. 58: In addition to its General Objections, FMA objects to the request on the following grounds: (a) it seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential and/or proprietary information not reasonably calculated to lead to the discovery of admissible evidence; (c) it is overbroad and unduly burdensome such as calling for the production of documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to the meaning of what constitutes a “contract” and the identities of “printer manufacturer[s]”.

1 **REQUEST NO. 59:** Documents listing each and every request made within the last six years by
2 a printer manufacturer for proposals from FMA to develop, manufacture, distribute, or otherwise
3 produce an FMA dynamic memory chip.

4 **RESPONSE TO REQUEST NO. 59:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
9 documents "listing each and every request"; (d) it is vague and ambiguous, in particular as to the
10 identities of "printer manufacturer[s]" and the meaning of what constitutes a "request... for
proposal[]"; and (e) it calls for information not within the possession or control of FMA.

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12 **REQUEST NO. 60:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
14 chip for a printer manufacturer.

15 **RESPONSE TO REQUEST NO. 60:** In addition to its General Objections, FMA objects to
16 the request on the following grounds: (a) it seeks information that is neither relevant to this action
17 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
18 and/or confidential information not reasonably calculated to lead to the discovery of admissible
19 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
20 "listing each and every proposal"; and (d) it is vague and ambiguous, in particular as to the
21 identities of "printer manufacturer[s]" and the meaning of what constitutes a "proposal".

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1 **REQUEST NO. 61:** Documents listing each and every copier manufacturer that has purchased
2 an FMA dynamic memory chip for use or incorporation in one of its products within the last six
3 years.

4 **RESPONSE TO REQUEST NO. 61:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
7 unduly burdensome such as calling for the production of documents listing “each and every
8 copier manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “copier
9 manufacturer[s]” and their “products”; and (d) it calls for information not within the possession or
10 control of FMA.

11 **REQUEST NO. 62:** Documents listing each and every copier that has used or incorporated an
12 FMA dynamic memory chip within the last six years.

13 **RESPONSE TO REQUEST NO. 62:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
16 unduly burdensome such as calling for the production of documents “listing each and every
17 copier”; (c) it is vague and ambiguous, in particular as to what constitutes a “copier” and what
18 constitutes “used or incorporated”; (d) it seeks information equally available to Plaintiffs; and (e)
19 it calls for information not within the possession or control of FMA.

1 **REQUEST NO. 63:** Documents listing each and every contract entered into within the last six
2 years between FMA and a copier manufacturer involving an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 63:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “copier manufacturer[s]”.

10 **REQUEST NO. 64:** Documents listing each and every request made within the last six years by
11 a copier manufacturer for proposals from FMA to develop, manufacture, distribute, or otherwise
12 produce an FMA dynamic memory chip.

13 **RESPONSE TO REQUEST NO. 64:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
16 and/or confidential information not reasonably calculated to lead to the discovery of admissible
17 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
18 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
19 identities of “copier manufacturer[s]” and the meaning of what constitutes a “request... for
20 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

1 **REQUEST NO. 65:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
3 chip for a copier manufacturer.

4 **RESPONSE TO REQUEST NO. 65:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
9 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
10 identities of “copier manufacturer[s]” and the meaning of what constitutes a “proposal”.

11 **REQUEST NO. 66:** Documents listing each and every fax machine manufacturer that has
12 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
13 the last six years.

14 **RESPONSE TO REQUEST NO. 66:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
17 unduly burdensome such as calling for the production of documents listing “each and every fax
18 machine manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “fax
19 machine manufacturer[s]” and their “products”; and (d) it calls for information not within the
20 possession or control of FMA.

1 **REQUEST NO. 67:** Documents listing each and every fax machine that has used or
2 incorporated an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 67:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents "listing each and every fax
7 machine"; (c) it is vague and ambiguous, in particular as to what constitutes a fax machine and
8 what constitutes "used or incorporated"; (d) it seeks information equally available to Plaintiffs;
9 and (e) it calls for information not within the possession or control of FMA.

10 **REQUEST NO. 68:** Documents listing each and every contract entered into within the last six
11 years between FMA and a fax machine manufacturer involving an FMA dynamic memory chip.

12 **RESPONSE TO REQUEST NO. 68:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
15 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
16 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
17 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
18 the meaning of what constitutes a "contract" and the identities of "fax machine manufacturer[s]".

1 **REQUEST NO. 69:** Documents listing each and every request made within the last six years by
2 a fax machine manufacturer for proposals from FMA to develop, manufacture, distribute, or
otherwise produce an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 69:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
9 identities of “fax machine manufacturer[s]” and the meaning of what constitutes a “request... for
10 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

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12 **REQUEST NO. 70:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a fax machine manufacturer.

14 **RESPONSE TO REQUEST NO. 70:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
19 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
20 identities of “fax machine manufacturer[s]” and the meaning of what constitutes a “proposal”.

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1 **REQUEST NO. 71:** Documents listing each and every home stereo manufacturer that has
2 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

3 **RESPONSE TO REQUEST NO. 71:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents listing “each and every home
7 stereo manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of “home
8 stereo manufacturer[s]” and their “products”; and (d) it calls for information not within the
9 possession or control of FMA.

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11 **REQUEST NO. 72:** Documents listing each and every home stereo that has used or
incorporated an FMA dynamic memory chip within the last six years.

12 **RESPONSE TO REQUEST NO. 72:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
15 unduly burdensome such as calling for the production of documents “listing each and every home
16 stereo”; (c) it is vague and ambiguous, in particular as to what constitutes a “home stereo” and
17 what constitutes “used or incorporated”; (d) it seeks information equally available to Plaintiffs;
18 and (e) it calls for information not within the possession or control of FMA.

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1 **REQUEST NO. 73:** Documents listing each and every contract entered into within the last six
2 years between FMA and a home stereo manufacturer involving an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 73:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “home stereo manufacturer[s]”.

10 **REQUEST NO. 74:** Documents listing each and every request made within the last six years by
11 a home stereo manufacturer for proposals from FMA to develop, manufacture, distribute, or
12 otherwise produce an FMA dynamic memory chip.

13 **RESPONSE TO REQUEST NO. 74:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
16 and/or confidential information not reasonably calculated to lead to the discovery of admissible
17 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
18 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
19 identities of “home stereo manufacturer[s]” and the meaning of what constitutes a “request... for
20 proposal[]”; and (e) it calls for information not within the possession or control of FMA.

1 **REQUEST NO. 75:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
 chip for a home stereo manufacturer.

3 **RESPONSE TO REQUEST NO. 75:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
9 identities of “home stereo manufacturer[s]” and the meaning of what constitutes a “proposal”.

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11 **REQUEST NO. 76:** Documents listing each and every video game system manufacturer that
12 has purchased an FMA dynamic memory chip for use or incorporation in one of its products
 within the last six years.

13 **RESPONSE TO REQUEST NO. 76:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
16 unduly burdensome such as calling for the production of documents listing “each and every video
17 game system manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
18 “video game system manufacturer[s]” and their “products”; and (d) it calls for information not
19 within the possession or control of FMA.

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1 **REQUEST NO. 77:** Documents listing each and every video game system that has used or
2 incorporated an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 77:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents "listing each and every video
7 game system"; (c) it is vague and ambiguous, in particular as to what constitutes a video game
8 system and what constitutes "used or incorporated"; (d) it seeks information equally available to
9 Plaintiffs; and (e) it calls for information not within the possession or control of FMA.

10 **REQUEST NO. 78:** Documents listing each and every contract entered into within the last six
11 years between FMA and a video game system manufacturer involving an FMA dynamic memory
12 chip.

13 **RESPONSE TO REQUEST NO. 78:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
16 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
17 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
18 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
19 the meaning of what constitutes a "contract" and the identities of "video game system
20 manufacturer[s]".

1 **REQUEST NO. 79:** Documents listing each and every request made within the last six years by
2 a video game system manufacturer for proposals from FMA to develop, manufacture, distribute,
3 or otherwise produce an FMA dynamic memory chip.

4 **RESPONSE TO REQUEST NO. 79:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
9 documents "listing each and every request"; (d) it is vague and ambiguous, in particular as to the
10 identities of "video game system manufacturer[s]" and the meaning of what constitutes a
11 "request... for proposal[]"; and (e) it calls for information not within the possession or control of
12 FMA.

13 **REQUEST NO. 80:** Documents listing each and every proposal made within the last six years
14 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
15 chip for a video game system manufacturer.

16 **RESPONSE TO REQUEST NO. 80:** In addition to its General Objections, FMA objects to
17 the request on the following grounds: (a) it seeks information that is neither relevant to this action
18 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
19 and/or confidential information not reasonably calculated to lead to the discovery of admissible
20 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
21 "listing each and every proposal"; and (d) it is vague and ambiguous, in particular as to the
22 identities of "video game system manufacturer[s]" and the meaning of what constitutes a
23 "proposal".

1 **REQUEST NO. 81:** Documents listing each and every land-line telephone manufacturer that
2 has purchased an FMA dynamic memory chip for use or incorporation in one of its products
3 within the last six years.

4 **RESPONSE TO REQUEST NO. 81:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
7 unduly burdensome such as calling for the production of documents listing “each and every land-
8 line telephone manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
9 “land-line telephone manufacturer[s]” and their “products”; and (d) it calls for information not
10 within the possession or control of FMA.

11 **REQUEST NO. 82:** Documents listing each and every land-line telephone that has used or
12 incorporated an FMA dynamic memory chip within the last six years.

13 **RESPONSE TO REQUEST NO. 82:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
16 unduly burdensome such as calling for the production of documents “listing each and every land-
17 line telephone”; (c) it is vague and ambiguous, in particular as to what constitutes a “land-line
18 telephone” and what constitutes “used or incorporated”; (d) it seeks information equally available
19 to Plaintiffs; and (e) it calls for information not within the possession or control of FMA.

1 **REQUEST NO. 83:** Documents listing each and every contract entered into within the last six
2 years between FMA and a land-line telephone manufacturer involving an FMA dynamic memory
chip.

3 **RESPONSE TO REQUEST NO. 83:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a "contract" and the identities of "land-line telephone
10 manufacturer[s]".

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12 **REQUEST NO. 84:** Documents listing each and every request made within the last six years by
13 a land-line telephone manufacturer for proposals from FMA to develop, manufacture, distribute,
or otherwise produce an FMA dynamic memory chip.

14 **RESPONSE TO REQUEST NO. 84:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
19 documents "listing each and every request"; (d) it is vague and ambiguous, in particular as to the
20 identities of "land-line telephone manufacturer[s]" and the meaning of what constitutes a
21 "request... for proposal[]"; and (e) it calls for information not within the possession or control of
22 FMA.

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1 **REQUEST NO. 85:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a land-line telephone manufacturer.

3 **RESPONSE TO REQUEST NO. 85:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 "listing each and every proposal"; and (d) it is vague and ambiguous, in particular as to the
9 identities of "land-line telephone manufacturer[s]" and the meaning of what constitutes a
10 "proposal".

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12 **REQUEST NO. 86:** Documents listing each and every microwave manufacturer that has
13 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

14 **RESPONSE TO REQUEST NO. 86:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
17 unduly burdensome such as calling for the production of documents listing “each and every
18 microwave manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
19 “microwave manufacturer[s]” and their “products”; and (d) it calls for information not within the
20 possession or control of FMA.

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1 **REQUEST NO. 87:** Documents listing each and every microwave that has used or incorporated
2 an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 87:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents "listing each and every
7 microwave"; (c) it is vague and ambiguous, in particular as to what constitutes a "microwave"
8 and what constitutes "used or incorporated"; (d) it seeks information equally available to
9 Plaintiffs; and (e) it calls for information not within the possession or control of FMA.

10 **REQUEST NO. 88:** Documents listing each and every contract entered into within the last six
11 years between FMA and a microwave manufacturer involving an FMA dynamic memory chip.

12 **RESPONSE TO REQUEST NO. 88:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
15 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
16 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
17 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
18 the meaning of what constitutes a "contract" and the identities of "microwave manufacturer[s]".

1 **REQUEST NO. 89:** Documents listing each and every request made within the last six years by
2 a microwave manufacturer for proposals from FMA to develop, manufacture, distribute, or
otherwise produce an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 89:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents "listing each and every request"; (d) it is vague and ambiguous, in particular as to the
9 identities of "microwave manufacturer[s]" and the meaning of what constitutes a "request... for
10 proposal[]"; and (e) it calls for information not within the possession or control of FMA.

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12 **REQUEST NO. 90:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a microwave manufacturer.

14 **RESPONSE TO REQUEST NO. 90:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
19 "listing each and every proposal"; and (d) it is vague and ambiguous, in particular as to the
20 identities of "microwave manufacturer[s]".

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1 **REQUEST NO. 91:** Documents listing each and every washing machine manufacturer that has
2 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

3 **RESPONSE TO REQUEST NO. 91:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents listing “each and every
7 washing machine manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
8 “washing machine manufacturer[s]” and their “products”; and (d) it calls for information not
9 within the possession or control of FMA.

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11 **REQUEST NO. 92:** Documents listing each and every washing machine that has used or incorporated an FMA dynamic memory chip within the last six years.

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RESPONSE TO REQUEST NO. 92: In addition to its General Objections, FMA objects to the request on the following grounds: (a) it seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and unduly burdensome such as calling for the production of documents "listing each and every washing machine"; (c) it is vague and ambiguous, in particular as to what constitutes a "washing machine" and what constitutes "used or incorporated"; (d) it seeks information equally available to Plaintiffs; and (e) it calls for information not within the possession or control of FMA.

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1 **REQUEST NO. 93:** Documents listing each and every contract entered into within the last six
2 years between FMA and a washing machine manufacturer involving an FMA dynamic memory
2 chip.

3 **RESPONSE TO REQUEST NO. 93:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “washing machine
10 manufacturer[s]”.

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12 **REQUEST NO. 94:** Documents listing each and every request made within the last six years by
13 a washing machine manufacturer for proposals from FMA to develop, manufacture, distribute, or
13 otherwise produce an FMA dynamic memory chip.

14 **RESPONSE TO REQUEST NO. 94:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
19 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
20 identities of “washing machine manufacturer[s]” and the meaning of what constitutes a
21 “request... for proposal[]”; and (e) it calls for information not within the possession or control of
22 FMA.

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1 **REQUEST NO. 95:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a washing machine manufacturer.

3 **RESPONSE TO REQUEST NO. 95:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
9 identities of “washing machine manufacturer[s]” and the meaning of what constitutes a
10 “proposal”.

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12 **REQUEST NO. 96:** Documents listing each and every power supply manufacturer that has
13 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

14 **RESPONSE TO REQUEST NO. 96:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
17 unduly burdensome such as calling for the production of documents listing “each and every
18 power supply manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
19 “power supply manufacturer[s]” and their “products”; and (d) it calls for information not within
20 the possession or control of FMA.

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1 **REQUEST NO. 97:** Documents listing each and every power supply that has used or
2 incorporated an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 97:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents “listing each and every
7 power supply”; (c) it is vague and ambiguous, in particular as to what constitutes “used or
8 incorporated” and what constitutes a “power supply”; (d) it seeks information equally available to
9 Plaintiffs; and (e) it calls for information not within the possession or control of FMA.

10 **REQUEST NO. 98:** Documents listing each and every contract entered into within the last six
11 years between FMA and a power supply manufacturer involving an FMA dynamic memory chip.

12 **RESPONSE TO REQUEST NO. 98:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
15 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
16 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
17 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
18 the meaning of what constitutes a “contract” and the identities of “power supply
19 manufacturer[s]”.

1 **REQUEST NO. 99:** Documents listing each and every request made within the last six years by
2 a power supply manufacturer for proposals from FMA to develop, manufacture, distribute, or
3 otherwise produce an FMA dynamic memory chip.

4 **RESPONSE TO REQUEST NO. 99:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
9 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
10 identities of “power supply manufacturer[s]” and the meaning of what constitutes a “request... for
proposal[]”; and (e) it calls for information not within the possession or control of FMA.

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12 **REQUEST NO. 100:** Documents listing each and every proposal made within the last six years
13 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
14 chip for a power supply manufacturer.

15 **RESPONSE TO REQUEST NO. 100:** In addition to its General Objections, FMA objects to
16 the request on the following grounds: (a) it seeks information that is neither relevant to this action
17 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
18 and/or confidential information not reasonably calculated to lead to the discovery of admissible
19 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
20 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
identities of “power supply manufacturer[s]”.

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1 **REQUEST NO. 101:** Documents listing each and every network-enabled device manufacturer
2 that has purchased an FMA dynamic memory chip for use or incorporation in one of its products
3 within the last six years.

4 **RESPONSE TO REQUEST NO. 101:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
7 unduly burdensome such as calling for the production of documents listing “each and every
8 network-enabled device manufacturer”; (c) it is vague and ambiguous, in particular as to the
9 identities of “network-enabled device manufacturer[s]” and their “products”; and (d) it calls for
10 information not within the possession or control of FMA.

11 **REQUEST NO. 102:** Documents listing each and every network-enabled device that has used or
12 incorporated an FMA dynamic memory chip within the last six years.

13 **RESPONSE TO REQUEST NO. 102:** In addition to its General Objections, FMA objects to
14 the request on the following grounds: (a) it seeks information that is neither relevant to this action
15 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
16 unduly burdensome such as calling for the production of documents “listing each and every
17 network-enabled device”; (c) it is vague and ambiguous, in particular as to what constitutes a
18 “network-enabled device” and what constitutes “used or incorporated”; (d) it seeks information
19 equally available to Plaintiffs; and (e) it calls for information not within the possession or control
20 of FMA.

1 **REQUEST NO. 103:** Documents listing each and every contract entered into within the last six
2 years between FMA and a network-enabled device manufacturer involving an FMA dynamic
memory chip.

3 **RESPONSE TO REQUEST NO. 103:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “network-enabled device
10 manufacturer[s]”.

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12 **REQUEST NO. 104:** Documents listing each and every request made within the last six years by
13 a network-enabled device manufacturer for proposals from FMA to develop, manufacture,
distribute, or otherwise produce an FMA dynamic memory chip.

14 **RESPONSE TO REQUEST NO. 104:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
17 and/or confidential information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
19 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
20 identities of “network-enabled device manufacturer[s]” and the meaning of what constitutes a
21 “request... for proposal[]”; and (e) it calls for information not within the possession or control of
22 FMA.

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1 **REQUEST NO. 105:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a network-enabled device manufacturer.

3 **RESPONSE TO REQUEST NO. 105:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
8 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
9 identities of “network-enabled device manufacturer[s]” and the meaning of what constitutes a
10 “proposal”.

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12 **REQUEST NO. 106:** Documents listing each and every home audio device manufacturer that has
13 purchased an FMA dynamic memory chip for use or incorporation in one of its products within
the last six years.

14 **RESPONSE TO REQUEST NO. 106:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
17 unduly burdensome such as calling for the production of documents listing “each and every home
18 audio device manufacturer”; (c) it is vague and ambiguous, in particular as to the identities of
19 “home audio device manufacturer[s]” and their “products”; and (d) it calls for information not
20 within the possession or control of FMA.

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1 **REQUEST NO. 107:** Documents listing each and every home audio device that has used or
2 incorporated an FMA dynamic memory chip within the last six years.

3 **RESPONSE TO REQUEST NO. 107:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
6 unduly burdensome such as calling for the production of documents "listing each and every home
7 audio device"; (c) it is vague and ambiguous, in particular as to what constitutes "used or
8 incorporated" and what constitutes a "home audio device"; (d) it seeks information equally
9 available to Plaintiffs; and (e) it calls for information not within the possession or control of
10 FMA.

11 **REQUEST NO. 108:** Documents listing each and every contract entered into within the last six
12 years between FMA and a home audio device manufacturer involving an FMA dynamic memory
13 chip.

14 **RESPONSE TO REQUEST NO. 108:** In addition to its General Objections, FMA objects to
15 the request on the following grounds: (a) it seeks information that is neither relevant to this action
16 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
17 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
18 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
19 documents "listing each and every contract"; and (d) it is vague and ambiguous, in particular as to
20 the meaning of what constitutes a "contract" and the identities of "home audio device
21 manufacturer[s]".

1 **REQUEST NO. 109:** Documents listing each and every request made within the last six years by
2 a home audio device manufacturer for proposals from FMA to develop, manufacture, distribute,
or otherwise produce an FMA dynamic memory chip.

3 **RESPONSE TO REQUEST NO. 109:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
6 and/or confidential information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
9 identities of “home audio device manufacturer[s]” and the meaning of what constitutes a
10 “request... for proposal[]”; and (e) it calls for information not within the possession or control of
11 FMA.

13 **REQUEST NO. 110:** Documents listing each and every proposal made within the last six years
14 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
chip for a home audio device manufacturer.

15 **RESPONSE TO REQUEST NO. 110:** In addition to its General Objections, FMA objects to
16 the request on the following grounds: (a) it seeks information that is neither relevant to this action
17 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
18 and/or confidential information not reasonably calculated to lead to the discovery of admissible
19 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
20 "listing each and every proposal"; and (d) it is vague and ambiguous, in particular as to the
21 identities of "home audio device manufacturer[s]".

1 **REQUEST NO. 111:** Documents listing each and every graphic display device manufacturer that
2 has purchased an FMA dynamic memory chip for use or incorporation in one of its products
3 within the last six years.

4 **RESPONSE TO REQUEST NO. 111:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
7 unduly burdensome such as calling for the production of documents listing “each and every
8 graphic display device manufacturer”; (c) it is vague and ambiguous, in particular as to the
9 identities of “graphic display device manufacturer[s]” and their “products”; and (d) it calls for
information not within the possession or control of FMA.

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11 **REQUEST NO. 112:** Documents listing each and every graphic display device that has used or
incorporated an FMA dynamic memory chip within the last six years.

12 **RESPONSE TO REQUEST NO. 112:** In addition to its General Objections, FMA objects to
13 the request on the following grounds: (a) it seeks information that is neither relevant to this action
14 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
15 unduly burdensome such as calling for the production of documents “listing each and every
16 graphic display device”; (c) it is vague and ambiguous, in particular as to what constitutes a
17 “graphic display device” and what constitutes “used or incorporated”; (d) it seeks information
18 equally available to Plaintiffs; and (e) it calls for information not within the possession or control
19 of FMA.

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1 **REQUEST NO. 113:** Documents listing each and every contract entered into within the last six
2 years between FMA and a graphic display device manufacturer involving an FMA dynamic
memory chip.

3 **RESPONSE TO REQUEST NO. 113:** In addition to its General Objections, FMA objects to
4 the request on the following grounds: (a) it seeks information that is neither relevant to this action
5 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks confidential
6 and/or proprietary information not reasonably calculated to lead to the discovery of admissible
7 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
8 documents “listing each and every contract”; and (d) it is vague and ambiguous, in particular as to
9 the meaning of what constitutes a “contract” and the identities of “graphic display device
10 manufacturer[s]”.

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12 **REQUEST NO. 114:** Documents listing each and every request made within the last six years by
13 a graphic display device manufacturer for proposals from FMA to develop, manufacture,
14 distribute, or otherwise produce an FMA dynamic memory chip.

15 **RESPONSE TO REQUEST NO. 114:** In addition to its General Objections, FMA objects to
16 the request on the following grounds: (a) it seeks information that is neither relevant to this action
17 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
18 and/or confidential information not reasonably calculated to lead to the discovery of admissible
19 evidence; (c) it is overbroad and unduly burdensome such as calling for the production of
20 documents “listing each and every request”; (d) it is vague and ambiguous, in particular as to the
21 identities of “graphic display device manufacturer[s]” and the meaning of what constitutes a
22 “request... for proposal[]”; and (e) it calls for information not within the possession or control of
23 FMA.

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1 **REQUEST NO. 115:** Documents listing each and every proposal made within the last six years
2 by FMA to develop, manufacture, distribute, or otherwise produce an FMA dynamic memory
3 chip for a graphic display device manufacturer.

4 **RESPONSE TO REQUEST NO. 115:** In addition to its General Objections, FMA objects to
5 the request on the following grounds: (a) it seeks information that is neither relevant to this action
6 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it seeks proprietary
7 and/or confidential information not reasonably calculated to lead to the discovery of admissible
8 evidence; (c) it is overbroad and unduly burdensome such as calling for the production documents
9 “listing each and every proposal”; and (d) it is vague and ambiguous, in particular as to the
10 identities of “graphic display device manufacturer[s]” and the meaning of what constitutes a
11 “proposal”.

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13 **REQUEST NO. 116:** Documents listing each and every consumer electronics manufacturer that
14 has purchased an FMA dynamic memory chip for use or incorporation in one of its products
15 within the last six years.

16 **RESPONSE TO REQUEST NO. 116:** In addition to its General Objections, FMA objects to
17 the request on the following grounds: (a) it seeks information that is neither relevant to this action
18 nor reasonably calculated to lead to the discovery of admissible evidence; (b) it is overbroad and
19 unduly burdensome such as calling for the production of documents listing “each and every
20 consumer electronics manufacturer”; (c) it is vague and ambiguous, in particular as to the
21 identities of “consumer electronics manufacturer[s]” and their “products”; and (d) it calls for
22 information not within the possession or control of FMA. .

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